

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Case No. 09-10243-MLW
)	
v.)	
)	
RYAN HARRIS,)	
)	
Defendant)	

GOVERNMENT’S MOTION FOR PRE-TRIAL CONFERENCE

The United States asks the Court to schedule a pre-trial conference at which the Court could select a trial date and also schedule a time for argument on the defendant’s pending motion to dismiss the indictment, if the Court would like to hear argument on this motion.

The government makes this motion to alert the Court to the fact that it believe that this case will proceed to trial, unless the Court grants the defendant’s motion to dismiss the indictment, and that it expects the trial to take between two and three weeks. The government is eager to have the Court set a trial date because undersigned counsel have identified several periods of time between late-January and early-March when they are available to try this case, if those periods fit with the Court’s schedule. Finding a similarly available period of time during the spring, however, appears likely to be very difficult because of a trial already scheduled in another session and previously scheduled family vacations. The government will, therefore, ask the Court to schedule this case for trial during the winter if at all possible.

There is also the matter of the defendant’s motion to dismiss the indictment, which has been briefed and on which the Court may want to hear argument. If so, the Court could schedule that argument during the pretrial conference.

For these reasons, the government asks the Court to schedule a pretrial conference in this

matter. All counsel (including defense counsel) are available for such a conference on the following days, if any of these dates fit with the Court's schedule:

10/18
10/19 (morning only)
10/20
10/24
10/25 (before 3:00)
10/26
10/28
11/1-4

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Adam Bookbinder
Adam J. Bookbinder
Assistant U.S. Attorney
Mona Sedky
Department of Justice Trial Attorney

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Adam Bookbinder

Dated: October 12, 2011